

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

JULIE ANN MANGINA, )  
vs. )  
CONSECO FINANCE CORP., ) CIVIL ACTION NO. 2:05-cv-485-B  
GREEN TREE SERVICING, LLC, and )  
CHRISTY MARIE GLENN KNIGHT, )  
Defendants. )

**MOTION TO PERMIT SUPPLEMENT TO**  
**MOTION FOR SUMMARY JUDGMENT**

NOW COMES **CHRISTY MARIE GLENN KNIGHT**, defendant herein, and moves the Court to permit the filing of the attached supplement to her pending motion for summary judgment and, for reason, says:

1. That the facts which necessitate the amendment were discovered after this defendant filed her motion for summary judgment and reply.
2. That the facts upon which this supplement is based completely negate the plaintiff's claims, mandate summary dismissal of those claims, and, in the interest of judicial economy and to avoid additional expense for the parties, these facts should be made known to the Court.

This supplemental motion is based upon all prior submissions, this supplemental submission and brief, including the American Honda Application referred to herein (Exhibit "A"), and this defendant's Request for Admissions (Exhibit "B"), and the plaintiff's anticipated responses thereto.

Respectfully submitted,



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CHRISTY MARIE GLENN KNIGHT

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this 16<sup>th</sup> day of June, 2006 electronically filed the foregoing *Motion to Permit Supplement to Motion for Summary Judgment* with the Clerk of the Court for the United States District Court, for the Middle District of Alabama, Northern Division, using the CM/ECF system, which will send notification of such filing to:

Andy Nelms, Esq. at [andynelms@jaylewislaw.com](mailto:andynelms@jaylewislaw.com).



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OF COUNSEL